

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In Re:

**Heather King,
Joseph King,
Debtors**

Chapter 13

Case No. 17-13702

MOTION TO APPROVE SECOND AMENDED
PRE-CONFIRMATION CHAPTER 13 PLAN

Now come the debtors and move for approval of their Second Amended Pre-Confirmation Chapter 13 Plan. In support of this motion, debtors state the following:

1. Debtors filed for Chapter 13 bankruptcy protection on October 4, 2017.
2. The Second Amended Chapter 13 Plan makes the following changes:
 - a. Includes a statement of cause in Part 2(A), and
 - b. Adjusts Exhibit 1 to account for the payment Debtors have made since the last amendment.

WHEREFORE, the debtors request the court allow as follows:

1. Approval of their Second Amended Pre-Confirmation Chapter 13 Plan.
2. For such other and further relief as this court deems just.

Dated: July 27, 2018

Debtors,
by their attorney,

/s/ John Ullian

John Ullian, Esq. BBO No. 542786
The Law Firm of Ullian and Associates, P.C
220 Forbes Road, Suite 106
Braintree, MA 02184
(781) 848-5980

CERTIFICATE OF SERVICE

I John Ullian, hereby certify under the pains and penalties of perjury that I served the foregoing **MOTION TO APPROVE SECOND AMENDED PRE-CONFIRMATION CHAPTER 13 PLAN** via ECF or by mailing a copy of same postage prepaid to interested parties listed below and everyone on the attached matrix.

Carolyn Bankowski
Chapter 13 Trustee Boston
P.O. Box 8250
Boston, MA 02114

John Fitzgerald, Office of the US Trustee
John W. McCormack Post Office & Court House
5 Post Office Square, 10th Floor, Suite 1000
Boston, MA 02109

Joseph & Heather King
45 Calypso Lane
Marshfield MA 02050

Wilimngton Savings Fund Society
Kristin A. Zilberstein
The Law Offices of Michelle Ghidotti
1920 Old Tustin Ave.
Santa Ana, CA 92705

Dated: July 27, 2018

/s/ John Ullian
John Ullian, Esq.
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Label Matrix for local noticing
0101-1
Case 17-13702
District of Massachusetts
Boston
Wed Jun 27 11:21:40 EDT 2018

AMIP Management, LL as Servier for Wilmingto
3020 Old Ranch Parkway, Suite 180
Seal Beach, CA 90740-2799

Bayview Loan Servicing LLC
Bankruptcy Dept.
4425 Ponce De Leo Blvd, 5th Floor
Coral Gables, FL 33146-1837

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U. S. Bankruptcy Court
J.W. McCormack Post Office & Court House
5 Post Office Square, Suite 1150
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PO Box 650091
Dallas, TX 75265-0091

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77 Accord Park Drive Bldg D4
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American Profit Recovery
34405 W 12 Mile road, Suite 379
Farmington, MI 48331-5608

(p)PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
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Milford, MA 01757-2821

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Avon, MA 02322-1184

Premier Diagnostics
Stevens Business Service
92 Bold Street, Suite 1
PO Box 1233
Lowell, MA 01853-1233

South Coast Dermatology
90 Libbey Parkway, Suite 200
East Weymouth, MA 02189-3155

South Shore Hospital
55 Fogg Road
PO Box 360
South Weymouth, MA 02190-0003

South Shore Hospital
PO Box 1021
Pembroke, MA 02359-1021

South Shore Hospital
c/o ROI
PO Box 62850
Baltimore, MD 21264-2850

South Shore Orthopedics
2 Pond Park, Suite 102
Hingham, MA 02043-4354

South Shore Radiological
PO Box 1079
Lewiston, ME 04243-1079

South Shore Women's Health
PO Box 188
South Weymouth, MA 02190-0002

Strata Pathology Services
PO Box 417436
Boston, MA 02241-7436

Town of Marshfield
Water & Sewer Department
Town Hall
Marshfield, MA 02050

Wilmington Savings Fund Society, FSB, DBA
3020 Old Ranch Parkway
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Seal Beach, CA 90740-2799

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Heather Dargin King
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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

PORTFOLIO RECOVERY ASSOCIATES, LLC
POB 41067
Norfolk, VA 23541

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Wilmington Savings Fund Society	End of Label Matrix	
	Mailable recipients	28
	Bypassed recipients	1
	Total	29